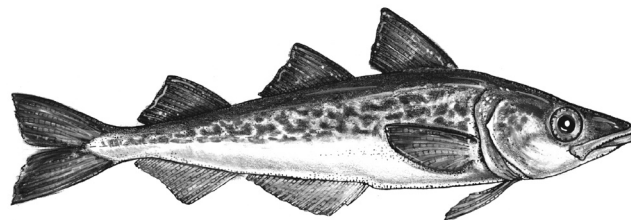


Common Mistakes in HACCP



Groundfish

Disclaimer: This information supplements HACCP training, which is available through the Marine Advisory Program at <http://www.uaf.edu/map/haccp.html>. Regulations are occasionally changed and subject to interpretation by consumers and agencies.

#1 Not including all species

It isn't enough to claim that your hazard analysis is for "groundfish" or even "Pacific groundfish." You need to list all the species that will be included in your hazard analysis in order to check for hazards in the Hazards Guide (<http://www.cfsan.fda.gov/~comm/haccp4.html>). It is permissible to group together several species as long as the products are similar and, more important, the hazards are the same. For Latin names and common names acceptable to the FDA go to <http://www.cfsan.fda.gov/~frf/seaintro.html>.

#2 Not stating the end user

Most groundfish parasites are listed as a species-related hazard and most have a footnote that the hazard "does not apply if the product is intended to be cooked by the consumer or end-user." It is critical to include the intended user in the hazard analysis. If your fish is going to be used for a raw or partially cooked product such as ceviche or sashimi, you will need to control the parasite hazard.

#3 Grouping together all ancillary products with primary products

If you are processing ancillary products such as stomach, milt, roe, or heads you may group these only with the main product (headed and gutted, round, or fillet) if the hazards are identical, there are no additional ingredients, and the expected use is the same. If the products are only going to be exported, and you are sure that none will end up in domestic markets, it is possible to exempt products from the HACCP regulation by following section 801(e) of the Food Drug and Cosmetic Act.

#4 Ignoring your machines

Simple headed and gutted forms might or might not have metal inclusion as a critical control point, depending on the header blades. Some blades are small and occasionally chip. Some are heavy weight and practically indestructible. Consider whether you have had any incidences of metal inclusion, either on board or reported from a secondary processor or consumer. In most factories header blades are regularly sharpened. A good practice is to include an item on your daily sanitation inspection for header blade inspection where the blade sharpener (factory foreman or engineer) can initial the form. This shows the regulatory inspector that the blades are being looked at and who is responsible.

#5 Ignoring your fishery

Metal inclusion might also be a critical point if your fish are caught with a hook rather than a net. If the fish swallows a hook or a rock it is possible that the header blade could chip. Once again consider whether you have had previous problems with metal fragments in your product. If there is any possibility of metal inclusion you need to address the hazard. You would want the home office to know, so create a formal procedure for informing them. After you have informed them they can make decisions on further action—requiring a metal detector, informing the buyer, or another procedure.



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ASG-39 2004